

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**CHRISTINA CAIN, DARRON
DANNA, STEPHANIE
YOUNGBLOOD, JOSHUA WOLF,
KIM WHITE, BRANDON GUERRA,
and CHARLES WILLIAMS, on
behalf of themselves, and all others
similarly situated,**

Plaintiffs,

v.

CGM, L.L.C. d/b/a CGM, INC.,

Defendant.

Case No.: 1:23-cv-02604-SEG

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Plaintiffs Christina Cain, Darron Danna, Stephanie Youngblood, Joshua Wolf, Kim White, Brandon Guerra, and Charles Williams, individually and on behalf of all others similarly situated (“Plaintiffs”) submit this Motion for Preliminary Approval of Class Action Settlement and Memorandum in support pursuant to FRCP 23(e). Plaintiffs request this Court preliminarily approve the Settlement, certify the Settlement Class, approve the proposed plan of Notice, and schedule a Final Approval Hearing in June 2024. With the Joint Declaration of Brandon Wise and Lynn Troops (Ex. 2), Plaintiffs submit the executed Settlement

Agreement (Ex. 1), as well as a Proposed Preliminary Approval Order jointly agreed and approved by the Parties (Ex. D to the Settlement Agreement).

Plaintiffs have negotiated a fair, adequate, and reasonable Settlement that guarantees Settlement Class Members significant relief in the form of direct reimbursements for expenses incurred and time spent relevant to the Data Incident and credit monitoring and financial asset protection services, or the option of a cash payment in lieu of submitting expenses and time. It also provides for data security enhancements that will better protect their sensitive information in the future. For these and the reasons set forth in the supporting Memorandum of Points and Authorities, Plaintiffs respectfully request this Court grant their Motion for Preliminary Approval of Class Action Settlement.

Dated: March 28, 2024

Respectfully Submitted,

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV*
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Counsel for Plaintiff and the Proposed Class

* *Pro Hac Vice* Granted.

CERTIFICATE OF COMPLIANCE

The undersigned certifies that this document has been prepared with one of the font and point selections approved by the Court in Civil Local Rule of Practice 5.1B.

**STRANCH, JENNINGS & GARVEY,
PLLC**

By: /s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV

Counsel for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on this 28 day of March, 2024, I caused a true and correct copy of the foregoing motion to be filed with the Clerk of the Court via the Court's CM/ECF system, which will send notification of such filing to the counsel of record in the above-captioned matter.

**STRANCH, JENNINGS & GARVEY,
PLLC**

By: /s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV

Counsel for Plaintiff and the Proposed Class